

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**ROBIN JOACHIM DARTELL, et al.,
Individually and on Behalf of All Others
Similarly Situated**

Plaintiff,

VS.

TIBET PHARMACEUTICALS, INC., et al
Defendant.

Civil Action No. 14-CV-3620-JMV

**P. VAN HOVE BVBA, PASCAL VAN HOVE
GCV, JOHN THOLLON, MICHAEL ZABINSKI,
JEAN DOYLE, AND MARK LAROSA,
INDIVIDUALLY AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED.**

Plaintiffs,

vs.

**UNIVERSAL TRAVEL GROUP, INC.,
JIANGPING JIANG, YIZHAO ZHANG, JIANG
XIE, JIDUAN YUAN, LAWRENCE LEE,
LIZONG WANG, DAVID T. SVOBODA, AND
ACQUAVELLA, CHIARELLI, SHUSTER & CO.,
LLP, ACQUAVELLA, CHIARELLI, SHUSTER,
BERKOWER & CO., LLP, JOSEPH P.
ACQUAVELLA, SANTO CHIARELLI, SAMUEL
SHUSTER, AND MAURICE BERKOWER.**

Defendants.

CASE No.: 2:11-cv-2164-JMV

MOTION TO SEAL PURSUANT TO LOCAL CIVIL RULE 5.3(c)

PLEASE TAKE NOTICE that, pursuant to Local Rule 5.3(c) of the Local Civil and Criminal Rules for the United States District Court for the District of New Jersey, Lead Plaintiffs Obasi Investment Limited, Jude Shao, Robin Dartell, Lixin Wu and Jason Helton (collectively “Tibet Plaintiffs”) and Lead Plaintiffs the Van Hove Group (“UTG Plaintiffs”) (collectively, “Plaintiffs”), by and through their counsel, shall move before the Honorable John Michael Vasquez at the United States District Court, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102 on January 3, 2017 at 9:00 a.m. or as soon thereafter as counsel may be heard for an order granting Plaintiffs’ Motion To Seal. Pursuant to Local Rule 7.1(d)(4), no legal brief is required because relevant proposed findings of fact and law required by Local Rule 5.3(c) have been set forth in the accompanying Declaration of Sara Fuks.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Plaintiffs shall rely on the accompanying Declaration of Sara Fuks as well as other pleadings and memoranda on file in this matter. A Proposed Order is submitted as well.

Dated: December 9, 2016

Respectfully submitted,

By: /s/ Laurence M. Rosen

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified in the Notice of Electronic Filing (NEF) on December 9, 2016.

/s/ Sara Fuks